

SLT:TJS
F.#2011R00065

M 11-1251

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UNITED STATES OF AMERICA

- against -

KWAN MILLER
NICOLE CROOKS
SHERIEKA SMALLING and
SHERREE HUNTE,

SEALED AFFIDAVIT AND
COMPLAINT IN SUPPORT OF
APPLICATION FOR
ARREST WARRANTS

(18 U.S.C. § 1029)

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

STACEY SULLIVAN, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between July 2010 and December 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants KWAN MILLER, NICOLE CROOKS, SHERIEKA SMALLING and SHERREE HUNTE, did knowingly and with intent to defraud traffic in and use one or more unauthorized access devices during a one-year period and by such conduct obtain anything of value aggregating \$1,000 or more during that period.

(Title 18, United States Code, Section 1029(a)(2)).

The source of your deponent's information and the grounds for her belief are as follows:^{1/}

1. I have been a Special Agent with the FBI for approximately three years. During my tenure with the FBI, I have been involved in numerous fraud investigations.

2. I have personally participated in the investigation of the offense referred to above, and from my personal participation in this investigation and from reports made to me by other law enforcement officers, I am familiar with the facts and circumstances set forth below.

I. Background

3. From late 2010 to the present, FBI agents have been investigating a group of individuals located primarily in Brooklyn who are participating in a scheme to fraudulently obtain credit card numbers and manufacture and use credit cards. Specifically, the scheme involves obtaining stolen credit card numbers through ICQ chats,^{FBI} printing those credit card numbers onto real credit card blanks, and using those credit cards to make purchases in retail stores.

4. In late 2010, a confidential informant ("CI") informed the FBI that an individual named KWAN MILLER and several other individuals, all located in Brooklyn, were fraudulently

^{1/} Because the purpose of this affidavit is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

printing credit cards. The CI indicated that MILLER obtained stolen credit card numbers through ICQ chats with individuals overseas. MILLER and his associates then used these credit card numbers to print credit cards using specialized credit card printing equipment. The printed credit cards were then provided to other individuals who purchased goods, which were then sold for profit. The CI also indicated that MILLER and his associates printed false identification documents.

5. The CI provided the ICQ account number of MILLER. Subpoena responses have confirmed that the address dimpledton456@aol.com was used to register that ICQ address on September 5, 2009 and remains registered to MILLER's ICQ address. The CI also indicated in late 2010 that one e-mail address used by MILLER was kingkon1851@aol.com.

6. Subpoena responses have also shown that MILLER has bought numerous specialty printers designed to print credit cards and identification cards and supplies for those printers between October 2010 and January 2011. In December 2010, MILLER purchased supplies for the above printers using a credit card in the name KWAN MILLER, which he direct to be shipped to the address BridgeView Tower, 189 Bridge Street, Apartment 4A, Brooklyn New York 11201. MILLER was then, and is currently on

federal probation.^{2/} In January 2011, he reported BridgeView Tower, 189 Bridge Street, Apartment 4A, Brooklyn New York 11201 as his home address to his supervising probation officer. A representative of the company indicated that MILLER always used the name "Jalen" in connection with his purchases.

7. I have received and reviewed emails pursuant to a number of search warrants,^{3/} some of which are described below.

8. On January 3, 2010, dimpled456@aol.com sent an email to nikkinikki4real@aol.com with an attachment entitled

^{2/} On January 19, 2007, MILLER pled guilty, under the name "Kwan Thomas," to access device fraud, in violation of 18 U.S.C. § 1029(a)(5), and aggravated identity theft, in violation of 18 U.S.C. § 1028A, in the Southern District of New York. He was sentenced to 39 months imprisonment to be followed by 4 years of supervised release. See United States v. Kwan Thomas, 06-CR-1059 (WHP) (S.D.N.Y.).

^{3/} On April 8, 2011, the Honorable Andrew L. Carter issued a search warrant for the email accounts dimpled45@aol.com and kingkon1851@aol.com. On June 1, 2011, the Honorable Robert M. Levy issued a search warrant for the email accounts dimpled45@aol.com, kingkon1851@aol.com, nikkinikki4real@aol.com, reeka1029@hotmail.com, nflowers2010@gmail.com, blakrepublikinc@gmail.com, and joelchaudry@yahoo.com. On June 11, 2011, the Honorable Viktor V. Pohorelsky issued a search warrant amending riders to the June 1, 2011 search warrant. On September 20, 2011, the Honorable Lois Bloom issued a search warrant for the email accounts dimpled456@aol.com, kingkon1851@aol.com, nikkinikki4real@aol.com, reeka1029@hotmail.com, nflowers2010@gmail.com, blakrepublikinc@gmail.com, joelchaudry@yahoo.com, lisa.saint213@gmail.com and f.joe14@ymail.com. On December 5, 2011, the Honorable Lois Bloom issued a search warrant for dimpled456@aol.com, kingkon1851@aol.com, nikkinikki4real@aol.com, reeka1029@hotmail.com, nflowers2010@gmail.com, blakrepublikinc@gmail.com, joelchaudry@yahoo.com, lisa.saint213@gmail.com and f.joe14@ymail.com.

"2010 work.txt." The attachment is a text file that contains more than 100 numbers that I have identified to be credit card numbers. In addition, the attachment contains "track 2" information, which is additional information related to the credit card number that can be used to encode that credit card number on a fraudulent credit card blank.

9. On January 30, 2011, kingkon1851@aol.com sent an email to reekal029@hotmail.com, which listed dozens of numbers I have identified to be credit card numbers. In addition, the email contains "track 1" and "track 2" information.

10. On February 28, 2011, kingkon1851@aol.com sent an email to nflowers2010@gmail.com with an attachment entitled "final.txt." The attachment is a text file that contains dozens of numbers I have identified to be credit card numbers. In addition, the attachment contains "track 2" information.

11. On April 21, 2011, kingkon1851@aol.com sent an email to reekal029@hotmail.com with an attachment entitled ".txt". The attachment is a text file that contains approximately one hundred numbers that American Express has identified to be American Express credit card numbers. One of the credit card numbers was XXXXXXXXXXXX-1005. On April 24, 2011, and again on April 26, 2011, fraud was reported on that credit card account.

12. On April 21, 2011, kingkon1851@aol.com sent an email to reeka1029@hotmail.com with attachment entitled "new shit for the kid.txt". The attachment is a text file that contains approximately one hundred numbers that American Express has identified to be American Express credit card numbers. One of the credit card numbers was XXXXXXXXXXXX-2001. On May 6, 2011, fraud was reported on that credit card account.

13. On April 22, 2011, reeka1029@hotmail.com sent an email to kingkon851@aol.com which listed dozens of numbers which I have identified to be credit card numbers. In addition, listed after each number was a description such as "CENTURION amex unknown unknown various EU" or "BLUE FOR BUSINESS amex unknown unknown various EU". Based on my investigation, I am aware that these are types of credit cards.

14. On December 5, 2011, shunte7@yahoo.com sent an email to kingkon1851@aol.com with an untitled attachment. The attachment is three pages of numbers that appear to be credit card and debit card numbers and "track 2" information. Next to each credit card number, a type of credit card is also indicated, such as "Gold/Platinum Amex," "VISA Gold/Prem," "Jpmorgan Chase Bank N.A."

15. The same day kingkon1851@aol.com sent some of those credit card numbers to wop920@aol.com..

16. American Express has identified over \$500,000 in losses relating to the fraudulent use of credit card numbers contained in the emails obtained through the above search warrants. American Express has also identified that account holders for those accounts are from multiple states. American Express has also indicated that losses are greater than \$1,000 for the past year.

II. Identification of Defendants

17. Based on the following, it is apparent that KWAN MILLER is the subscriber and user of the email accounts kingkon1851@aol.com and dimpled45@aol.com

a. On September 1, 2011, bridgeviewtower@yahoo.com sent a "Common Charge Payment Reminder" to nikkinikki4real@aol.com and kingkon1851@aol.com, which indicates common charges due in connection with Apartment 4A at BridgeView Tower, 189 Bridge Street, Brooklyn New York 11201. Based on reports from MILLER's probation officer and a review of public records, KWAN MILLER and NICOLE CROOKS previously resided in Apartment 4A, BridgeView Tower, 189 Bridge Street, Brooklyn, New York. There are other emails indicating that KWAN MILLER and NICOLE CROOKS are currently subletting that apartment to another individual. A email from nmcloveslife@gmail.com to nikkinikki4real@aol.com attaches a sublet agreement for that apartment.

b. As indicated above, a representative of the company that distributes these specialty printers indicated that on or about March 15, 2011, MILLER called the company and, using the name "Jalen," asked for a sheet indicating the current prices for printers. MILLER requested that the pricing sheets be e-mailed to him at kingkon1851@aol.com. MILLER had previously had the company ship printers and supplies to Apartment 4A at BridgeView Tower.

c. As indicated above, the CI indicated in late 2010 that one e-mail address used by MILLER was dimpledon456@aol.com.

d. On September 13, 2011, an email from "Facebook" password_change+zj4ocf=tsco6@facebookmail.com to "Don Kwan" at dimpledon456@aol.com indicated that the password to his Facebook account had changed. I have previously observed that MILLER maintains a Facebook^{4/} account in the name "Don Kwan" which contains pictures of MILLER.

e. On May 10, 2011, an email from "Continental Airlines" ContinentalAirlines@email.continental.com to dimpledon456@aol.com indicated that the "OnePass" account balance for KWAN MILLER was 1,000 miles.

^{4/} Facebook is a social networking application that allows individuals to maintain personal pages and to connect to other individuals with Facebook accounts.

18. Based on the following, it is apparent that NICOLE CROOKS is the owner and user of the email account nikkinikki4real@aol.com:

a. On September 1, 2011, bridgeviewtower@yahoo.com sent a "Common Charge Payment Reminder" to nikkinikki4real@aol.com and kingkon1851@aol.com, which indicates common charges due in connection with Apartment 4A at BridgeView Tower, 189 Bridge Street, Brooklyn New York 11201. As set forth above, KWAN MILLER and NICOLE CROOKS previously resided in Apartment 4A, BridgeView Tower, 189 Bridge Street, Brooklyn, New York. There are other emails indicating that KWAN MILLER and NICOLE CROOKS are currently subletting that apartment to another individual.

b. On April 18, 2011, "Nicole" at nmcloveslife@gmail.com sent an email to nikkinikki4real@aol.com with an attachment entitled "NCrooks2010TaxReturn.pdf." That attachment is a 2010 federal tax return for NICOLE CROOKS. The tax return has a social security number, which I have identified belong to NICOLE CROOKS. The tax return also lists a home address of 189 Bridge Street, Brooklyn, New York.

c. On October 10, 2011, "Nicole" at nmcloveslife@gmail.com sent an email to nikkinikki4real@aol.com with an attachment entitled "20111006145409412.pdf." The attachment was a lease for 300 Prospect Avenue, Apartment 11E,

Hackensack, NJ 07601. KWAN MILLER has provided that address to probation officers in Brooklyn and New Jersey as his home address. A probation officer visited that address in November 2011 and observed KWAN MILLER and NICOLE CROOKS in the apartment.

19. Based on the following, it is apparent that SHERIEKA SMALLING is the owner and user of the email account reekal029@hotmail.com:

a. On April 28, 2011, cpetruzzi@levi.com sent an email to reekal029@hotmail.com entitled "CONFIDENTIAL employee information Sherieka Smalling." The email states, in part, "Hi Sherieka, Hope you are well. As per our discussion, attached is your lay off severance package." On the same day, reekal029@hotmail.com responded that she received the email.

b. On June 6, 2011, lordandtaylor@hrsmart.com sent an email to reekal029@hotmail.com entitled "Resume submission confirmation." The email states, in part: "Dear Sherieka, Your resume has been added to the Lord & Taylor-stores Career Site."

c. On May 12, 2009, "Reeka" at yeahyoulikethat@gmail.com sent an email to reekal029@hotmail.com with the subject line "Me" and an attachment containing a photograph. Based on Department of Motor Vehicles photographs and surveillance, I have identified that photograph to be of SHERIEKA SMALLING.

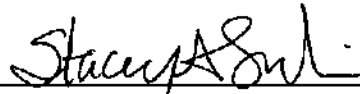
20. Based on the following, it is apparent that SHERREE HUNTE is the owner and user of the email account shunte7@yahoo.com:

a. On September 20, 2011, shunte7@yahoo.com forwarded an email to blakreplikinc@gmail.com. The forwarded email was an email from nycserve@finance.nyc.gov to shunte7@yahoo.com with the subject line "Thank you for your payment to the City of New York." The email confirmed a payment to the NYC Department of Finance for parking fines and indicated that the payment was made in the name SHERREE HUNTE.

b. In addition, SHERREE HUNTE maintains a Facebook account under the name "Ree Hunte" with the contact information "shunte7." I have identified the profile picture of that account to be Sheree Hunte based on DMV photographs. SHERREE HUNTE is also "friends" on Facebook with KWAN MILLER.

Based on the foregoing, I respectfully request that arrest warrants be issued for KWAN MILLER, NICOLE CROOKS,

SHERIEKA SMALLING and SHERREE HUNTE so that they may be dealt with according to law.



Stacey Sullivan
Special Agent
Federal Bureau of Investigation

Sworn to before me this
19th Day of December, 2011



UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK